

1 2 3 4	United States Attorney KEVIN C. KHASIGIAN Assistant U. S. Attorney 501 I Street, Suite 10-100 Sacramento, CA 95814 Telephone: (916) 554-2700		
5	Attorneys for the United States		
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8	IN THE UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA		
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11	UNITED STATES OF AMERICA,	2:20-MC-00075-KJM-DB	
12	Plaintiff,		
13	v.	STIPULATION AND ORDER EXTENDING TIME FOR FILING A COMPLAINT FOR FORFEITURE AND/OR TO OBTAIN AN INDICTMENT ALLEGING FORFEITURE	
14	APPROXIMATELY \$9,000.00 IN U.S. CURRENCY, AND		
15 16	APPROXIMATELY \$7,200.00 IN U.S. CURRENCY,		
17	Defendants.		
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19	It is hereby stipulated by and between the United States of America and potential claimant		
20	Charles Isles ("claimant"), appearing in propria persona, as follows:		
21	1. On or about January 14, 2020, claimant filed a claim in the administrative forfeiture		
22	proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,000.00 in U.S.		
23	Currency and Approximately \$7,200.00 in U.S. Currency (hereafter "defendant currency"), which were		
24	seized on October 25, 2019.		
25	2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required		
26	by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file		
27	claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant		
28	has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding		

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3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was April 13, 2020.

4. By Stipulation and Order filed April 7, 2020, the parties stipulated to extend to July 10, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the

defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to

- 5. By Stipulation and Order filed July 10, 2020, the parties stipulated to extend to August 10, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.
- 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to September 9, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

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1	7. Accordingly, the parties agree that the deadline by which the United States shall be		
2	required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment		
3	alleging that the defendant currency is subject to forfeiture shall be extended to September 9, 2020.		
4	Dated: <u>8/6/2020</u>	McGREGOR W. SCOTT	
5	n.	United States Attorney	
6	By:	/s/ Kevin C. Khasigian KEVIN C. KHASIGIAN Assistant U.S. Attorney	
7		Assistant U.S. Attorney	
8	Dated: <u>8/5/2020</u>	<u>/s/ Charles Isles</u> CHARLES ISLES	
9		Potential Claimant	
10		Appearing in propria persona (Signature outhorized by amail)	
11		(Signature authorized by email)	
12	IT IS SO ORDERED.		
13 14	Dated: August 8, 2020.	MAnuel.	
15		CHIEF UNITED STATES DISTRICT JUDGE	
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